

1 KEKER & VAN NEST LLP  
ROBERT A. VAN NEST - # 84065  
2 rvannest@kvn.com  
CHRISTA M. ANDERSON - # 184325  
3 canderson@kvn.com  
DANIEL PURCELL - # 191424  
4 dpurcell@kvn.com  
633 Battery Street  
5 San Francisco, CA 94111-1809  
Telephone: (415) 391-5400  
6 Facsimile: (415) 397-7188

7 KING & SPALDING LLP  
BRUCE W. BABER (pro hac vice)  
8 bbaber@kslaw.com  
1185 Avenue of the Americas  
9 New York, NY 10036  
Tel: (212) 556-2100  
10 Fax: (212) 556-2222

11 Attorneys for Defendant  
GOOGLE INC.

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 ORACLE AMERICA, INC.,  
16 Plaintiffs,  
17 v.  
18 GOOGLE INC.,  
19 Defendant.

Case No. 3:10-cv-03561 WHA

**DECLARATION OF KATE LAZARUS IN  
SUPPORT OF GOOGLE INC.'S  
ADMINISTRATIVE MOTION TO SEAL  
GOOGLE'S TRIAL BRIEF**

Dept. Courtroom 8, 19<sup>th</sup> Fl.  
Judge: Hon. William Alsup

1 I, Kate Lazarus, declare as follows:

2 1. I am an associate at the law firm of Kecker & Van Nest LLP, counsel to Google  
3 Inc. ("Google") in the present case. In accordance with Local Rule 79-5(d)(1)(A) & (e), I submit  
4 this declaration in support of Google's Administrative Motion to Seal Google's Trial Brief. I  
5 have knowledge of the facts set forth herein, and if called to testify as a witness thereto could do  
6 so competently under oath.

7 2. The following portions of Google's Trial Brief summarize, quote from, or  
8 reproduce portions of materials that have been designated by Oracle as "CONFIDENTIAL" or  
9 "HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY" under the Stipulated Protective  
10 Order in this case:

- 11 • Page 3, lines 24-26: text after "supervisor" until end of sentence.
- 12 • Page 4, lines 9-10: text after "deposition" until end of sentence.
- 13 • Page 4, lines 18-19: text after "case that" until end of sentence.
- 14 • Page 5, lines 22-23: text after "for Sun" until end of sentence.
- 15 • Page 6: lines 3-5: text after "testified," until end of sentence.

16 I declare under penalty of perjury that the foregoing is true and correct and that this  
17 declaration was executed at San Francisco, California on April 20, 2016.

18  
19  
20 By: 

21 KATE E. LAZARUS